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**VIA ECF & E-MAIL**

January 20, 2022

United States District Court  
Southern District of New York  
Attn: Gregory H. Woods, U.S.D.J.  
500 Pearl Street, Courtroom 12C  
New York, NY 10007-1312  
woodsnydchambers@nysd.uscourts.gov

Re: Molina v. Hornblower Group, Inc., *et al.*  
Case No.: 1:20-cv-10821 (GHW) (OTW)  
Letter Motion for Extension of Time to Oppose Motion for Summary Judgment

This office represents the Plaintiff in the above-referenced case. Plaintiff writes with the consent of Defendants to respectfully request a ten (10) day extension of time until Friday, February 4, 2022 to submit opposition papers to Defendants' motion for summary judgment (with a reciprocal extension for Defendants to submit reply papers in further support). For the reasons set forth below, Plaintiff submits that good cause exists to grant the requested extension of time.

Pursuant to ¶ 1(E) of this Court's Individual Rules of Practice in Civil Cases (hereinafter the "Court's Rules"), Plaintiff submits that: (1) the current deadline for the submission of opposition papers is Wednesday, January 26, 2022; (2) there have been no previous requests for an extension of this deadline; (3) the reason for the request is because the Plaintiff is currently traveling and is unable to continue participating in the preparation of opposition papers and, in addition, because your undersigned will be traveling this weekend, as well; (4) the adversaries consent to this request so long as a reciprocal extension for Defendants to submit reply papers by Monday, February 14, 2022 is granted, to which Plaintiff consents; and (5) no proposed Revised Civil Case Management Plan and Scheduling Order is necessary.

Given the foregoing circumstances, Plaintiff respectfully submits that good cause exists to grant the requested extensions of time. See Fed. R. Civ. P. 6(b)(1)(A). Accordingly, Plaintiff submits that his instant letter motion be granted.

Plaintiff thanks this honorable Court for its time and attention to this case.

Dated: Forest Hills, New York  
January 20, 2022

Respectfully submitted,

**SHALOM LAW, PLLC**

/s/ Jonathan Shalom

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